

COMPETITIVE COMMUNICATIONS GROUP

June 22, 1999

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Secretary  
FCC  
Portals II  
445 12<sup>th</sup> Street, S.W.  
Suite W-A 325  
Washington, DC 20554

RE: IntraLATA Toll Dialing Parity Plan

The accompanying IntraLATA Dialing Parity Plans issued by KNOLOGY of Georgia and KNOLOGY of Florida (Company) are sent to you for filing in compliance with file number NSD-L-98-121 and CC Docket 96-98.

An original and four copies are enclosed. Additionally, a SASE and a return stamp copy of this transmittal letter are enclosed to confirm receipt of this filing. Questions concerning this filing may be directed to the undersigned on 301/ 842-1437.

Respectfully submitted,

*Terri K. Firestein*

Terri K. Firestein  
Consultant  
on behalf of

KNOLOGY of Georgia  
KNOLOGY of Florida

Enclosures

cc: Bruce Schoonover, Jr.  
KNOLOGY of Georgia  
KNOLOGY of Florida

No. of Copies rec'd 014  
List A B C D E

**Application of KNOLOGY of Georgia for Approval of IntraLATA  
Toll Dialing Parity Plan Pursuant to FCC Order FCC 99-54, CC  
Docket No. 96-98, Released March 23, 1999**

**KNOLOGY of Georgia**

**May 17, 1999**

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## KNOLOGY of Georgia IntraLATA Toll Dialing Parity Plan

### I. OBJECTIVE/PURPOSE

In Compliance with the Federal Communications Commission ("FCC") rules delineated in 47 C.F.R. Sections 51.207 through 51.215, KNOLOGY of Georgia ("the Company") files its plan for implementing intraLATA toll dialing parity ("the Plan") in areas of the State in which the Company is certified to provide local exchange service.

The intent of the Plan is to permit customers to select and subsequently to route intraLATA toll calls automatically without the use of access codes, to the interexchange carriers ("IXC") that have established themselves as Access Customers of the Company ("Participating Carrier").

### II. IMPLEMENTATION SCHEDULE

The Company intends to offer dialing parity for intraLATA calls within thirty (30) days of state commission approval of the Plan.

### III. CARRIER SELECTION PROCEDURES

The Company will implement the full 2-PIC carrier selection methodology. With the full 2-PIC methodology, customers will be able to subscribe to one Participating Carrier for their interLATA toll calls and to subscribe to the same or a different Participating Carrier for their intraLATA toll calls.

Company employee's who communicate with the public, accept service orders and serve in customer service capacities will be trained to explain the availability of 2-PIC Equal Access, and to assist customers in making an initial PIC selection or in changing a PIC selection.

### IV. CARRIER NOTIFICATION

An IXC that desires to become an Access Customer and Participating Carrier shall notify the Company by requesting and completing the Carrier Participation Form. The request for this Form may be made by telephone or e-mail to the designated Company carrier relations contact. Once the Carrier Participation Form has been returned to the Company and an Access Service Request has been processed, that carrier will be added to the alphabetical list of Participating Carriers maintained in each business office.

### V. NEW CUSTOMERS

Customers contacting the Company requesting new local exchange service will be informed of the opportunity to select both an intraLATA and interLATA PIC at no charge. If requested by the customer, the Company will provide an alphabetical list of Participating Carriers. New customers who do not make an affirmative selection of an intraLATA toll service provider will be identified in the Company records as a "no-PIC" and will not be defaulted to a toll service provider. New customers identified in the Company records as "no-PIC" will be required to dial the access code 101XXXX where XXXX represents the identification code of the carrier they desire to use. The use of the access code will be required for placement of each intraLATA toll call until they make an affirmative selection.

## KNOLOGY of Georgia IntraLATA Toll Dialing Parity Plan

### VI. EXISTING CUSTOMERS

On the date which intraLATA subscription service is available, the Company's existing retail customers may subscribe to the intraLATA toll service of a Participating Carrier. An existing customer who does not make a selection of an intraLATA PIC when intraLATA subscription service becomes available will default to the intraLATA toll service provider currently in use, at no charge.

### VII. INITIAL PIC REQUEST

A customer's initial PIC request will be made at no charge for the first six (6) months after intraLATA subscription service becomes available. After the initial six (6) months, the Company will charge customers the intraLATA PIC Change Charge at tariffed rates. An initial application of "no-PIC" will, for purposes of applying the PIC Change Charge, be viewed as an affirmative PIC selection.

### VIII. PIC CHANGE REQUEST FROM A CUSTOMER

A customer's request to change his/her current intraLATA PIC will be accepted and processed by the Company in accordance with current FCC PIC change procedures. The customer will incur the tariffed non-recurring PIC Change Charge.

### IX. PIC CHANGE REQUEST FROM A PARTICIPATING CARRIER

A customer's request to change his/her current intraLATA PIC received by the Company from a Participating Carrier on behalf of said customer will be accepted and processed by the Company in accordance with current FCC PIC change procedures. The customer will incur the tariffed non-recurring PIC Change Charge.

### X. COST RECOVERY

As stated in section 51.215 of FCC Order 96-333, CC Docket No. 96-98, "a LEC may recover the incremental costs necessary for the implementation of toll dialing parity. The LEC must recover such costs from all providers of telephone exchange service and telephone toll service in the area served by the LEC, including that LEC." The incremental costs associated with implementing toll dialing parity by the Company include:

1. training for Business Office, Marketing, Carrier Services, Customer Services and Service Center personnel
2. customer notification (bill message and bill insert)
3. implementation activity

The Company proposes to recoup the incremental cost of implementing intraLATA dialing parity over a period of twelve months beginning on the date of implementation. A cost recovery per minute rate will be developed based on the identified cost divided by the total of all Participating Carrier's originating minutes of use, which will include the Company's intraLATA toll minutes. The result will be an amount to be added (adder) to the intraLATA Carrier Common Line (CCL) rate element.

Carrier's who enter the market after implementation will be assessed the adder in the same manner as other Participating Carriers.

Application of KNOLOGY of Florida for Approval of IntraLATA  
Toll Dialing Parity Plan Pursuant to FCC Order FCC 99-54, CC  
Docket No. 96-98, Released March 23, 1999

KNOLOGY of Florida

May 17, 1999  
Revised June 10, 1999  
Revised June 14, 1999

## KNOLOGY of Florida IntraLATA Toll Dialing Parity Plan

### I. OBJECTIVE/PURPOSE

In Compliance with the Federal Communications Commission ("FCC") rules delineated in 47 C.F.R. Sections 51.207 through 51.215, KNOLOGY of Florida ("the Company") files its plan for implementing intraLATA toll dialing parity ("the Plan") in areas of the State in which the Company is certified to provide local exchange service.

The intent of the Plan is to permit customers to select and subsequently to route intraLATA toll calls automatically without the use of access codes, to the interexchange carriers ("IXC") that have established themselves as Access Customers of the Company ("Participating Carrier").

### II. IMPLEMENTATION SCHEDULE

The Company intends to offer dialing parity for intraLATA calls within thirty (30) days of state commission approval of the Plan.

### III. CARRIER SELECTION PROCEDURES

The Company will implement the full 2-PIC carrier selection methodology. With the full 2-PIC methodology, customers will be able to subscribe to one Participating Carrier for their interLATA toll calls and to subscribe to the same or a different Participating Carrier for their intraLATA toll calls.

Company employee's who communicate with the public, accept service orders and serve in customer service capacities will be trained to explain the availability of 2-PIC Equal Access, and to assist customers in making an initial PIC selection or in changing a PIC selection.

### IV. CARRIER NOTIFICATION

An IXC that desires to become an Access Customer and Participating Carrier shall notify the Company by requesting and completing the Carrier Participation Form. The request for this Form may be made by telephone or e-mail to the designated Company carrier relations contact. Once the Carrier Participation Form has been returned to the Company and an Access Service Request has been processed, that carrier will be added to the alphabetical list of Participating Carriers maintained in each business office.

### V. NEW CUSTOMERS and EXISTING CUSTOMERS

Customers contacting the Company requesting new local exchange service will be informed of the opportunity to select both an intraLATA and interLATA PIC at no charge. Existing Customers will be notified by bill insert of their opportunity to select an intraLATA PIC initially at no charge. If requested by the customer, the Company will provide an alphabetical list of Participating Carriers. Customers who do not make an affirmative selection of an intraLATA toll service provider will be identified in the Company records as a "no-PIC" and will not be defaulted to a toll service provider. Customers identified in the Company records as "no-PIC" will be required to dial the access code 101XXXX where XXXX represents the identification code of the carrier they desire to use. The use of the access code will be required for placement of each intraLATA toll call until they make an affirmative selection.

KNOLOGY of Florida IntraLATA Toll Dialing Parity Plan

VI. INITIAL PIC REQUEST

A customer's initial PIC request will be made at no charge for the first six (6) months after intraLATA subscription service becomes available. After the initial six (6) months, the Company will charge customers the intraLATA PIC Change Charge at tariffed rates. An initial application of "no-PIC" will, for purposes of applying the PIC Change Charge, be viewed as an affirmative PIC selection.

VII. PIC CHANGE REQUEST FROM A CUSTOMER

A customer's request to change his/her current intraLATA PIC will be accepted and processed by the Company in accordance with current FCC PIC change procedures. The customer will incur the tariffed non-recurring PIC Change Charge.

VIII. PIC CHANGE REQUEST FROM A PARTICIPATING CARRIER

A customer's request to change his/her current intraLATA PIC received by the Company from a Participating Carrier on behalf of said customer will be accepted and processed by the Company in accordance with current FCC PIC change procedures. The customer will incur the tariffed non-recurring PIC Change Charge.